

**Louisville Metro Air Pollution Control District**  
**850 Barret Ave., Louisville, Kentucky 40204**  
**09 April 2013**

**Federally Enforceable District Origin Operating Permit**  
**Statement of Basis**

**Company:** IQL Corporation

**Plant Location:** 8055 National Turnpike, Louisville, KY 40214

**Date Application Received:** 12 September 2011

**Date of Draft Permit:** 09 April 2013

**Date of Proposed Permit:** 09 April 2013

**District Engineer:** Dustin Gohs

**Permit No:** 36523-13-F

**Plant ID:** 1806

**SIC Code:** 3499

**NAICS:** 332999

**AFS:** 01806

**Introduction:**

This permit will be issued pursuant to District Regulation 2.17- *Federally Enforceable District Origin Operating Permits*. Its purpose is to limit the plant wide potential emission rates from this source to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

Jefferson County is classified as an attainment area for lead (Pb), sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), 1 hr and 8 hr ozone (O<sub>3</sub>), and particulate matter less than 10 microns (PM<sub>10</sub>); and is a non-attainment area for particulate matter less than 2.5 microns (PM<sub>2.5</sub>).

**Application Type/Permit Activity:**

☒ Initial Issuance

☐ Permit Revision

☐ Administrative

☐ Minor

☐ Significant

☐ Permit Renewal

**Compliance Summary:**

☐ Compliance certification signed

☐ Source is out of compliance

☐ Compliance schedule included

☒ Source is operating in compliance

**I. Source Information**

1. **Product Description:** IQL Corporation is a metal fabrication facility.
2. **Process Description:** The raw metal material is welded together to construct industrial conveyance lines. The metal products are coated using a spray coating application.
3. **Site Determination:** There are no other facilities that are contiguous or adjacent.

**Emission Unit Summary:**

Emission Unit	Equipment Description
U1	Two (2) Global Finishing Solutions paint booths, model IFP-161012 and IFP-16812, used to control emissions from two (2) Spraytech airless spary guns, model 1720, each with a spray capacity of 0.33 gal/min and two (2) Binks airless spray guns, model AA1600M, each with a spray capacity of 0.4 gal/min
U2	Nineteen (19) welding stations used for constructing conveyor parts

4. **Fugitive Sources:** There are no fugitive source emissions at this facility.

5. **Permit Revisions:**

Revision No.	Issue Date	Public Notice Date	Type	Attachment No./Page No.	Description
Initial	___/___/2013	04/09/2013	Initial	Entire Permit	Initial Issuance

6. **Emission Summary:**

Pollutant	District Calculated Actual Emissions (tn/yr) 2011 2 <sup>nd</sup> Semi-Annual Report Data	Pollutant that triggered Major Source Status (based on PTE)
CO	0	No
NO <sub>x</sub>	0	No
SO <sub>2</sub>	0	No
PM <sub>10</sub>	3.12	Yes
VOC	2.11	No
Total HAPs	1.62	Yes
Single HAP (Xylene)	0.67	Yes

**7. Applicable Requirements:**

<input type="checkbox"/> PSD	<input type="checkbox"/> 40 CFR 60	<input checked="" type="checkbox"/> SIP	<input checked="" type="checkbox"/> 40 CFR 63
<input type="checkbox"/> NSR	<input type="checkbox"/> 40 CFR 61	<input checked="" type="checkbox"/> District-Origin	<input type="checkbox"/> Other

**8. MACT Requirements:** The source has no future MACT requirements.**9. Referenced Federal Regulations in Permit:**

40 CFR 63, Subpart XXXXXX	National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories
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**II. Regulatory Analysis**

- 1. Acid Rain Requirements:** IQL Corporation is not subject to the Acid Rain Program.
- 2. Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. IQL Corporation does not manufacture, sell, or distribute any of the listed chemicals.
- 3. Prevention of Accidental Releases 112(r):** IQL Corporation does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, *Chemical Accident Prevention Provisions*, in a quantity in excess of the corresponding specified threshold amount.
- 4. 40 CFR Part 64 Applicability Determination:** IQL Corporation is not subject to 40 CFR Part 64 - *Compliance Assurance Monitoring for Major Stationary Sources*.
- 5. Basis of Regulation Applicability**

**a. Plant-wide**

IQL Corporation is a potential major source for the pollutants PM<sub>10</sub>, Single HAP Xylene, Single HAP Toluene and Total HAP. Regulation 2.17 – *Federally Enforceable District Origin Operating Permits* establishes requirements to limit the plant wide potential emission rates to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

IQL Corporation has been given a plant wide emission limit of 50 tons per year for the pollutant VOC based on a usage limit 4,490 gal/yr for each paint booth.

Regulations 5.00 5.21, 5.21, and 5.23 (STAR Program) establishes requirements for environmental acceptability of toxic air contaminants (TACs) and the requirement to comply with all applicable emission standards. IQL Corporation submitted a STAR EA Demonstration for Category 1 and Category 2 TACs for the paint booths on September 30, 2008. However, Manganese was not included in this analysis. Therefore, IQL Corporation was given a coating usage limit based on the de minimis value for Manganese.

b. **Emission Unit U1 – Global Finishing Solutions Paint Booths**

i. **Equipment:**

P/PE	Capacity	Install Date	Applicable Regulation	Basis for Applicability
E1: Global Finishing Solutions Paint Booth	0.73 gal/min	1/2/2012	7.08, 7.59	Regulation 7.08 establishes the requirements for PM emission from new processes that commence construction after September 1, 1976.
E2: Global Finishing Solutions Paint Booth	0.73 gal/min	1/2/2012		Regulation 7.59 establishes the requirements for VOC emissions from new processes that commence construction after May 20, 1981.

ii. **Standards/Operating Limits**

1) **VOC**

- (a) Regulation 2.17, section 5.1, allows the source to set a synthetic limit below the major source threshold. The source has been given a synthetic limit of 50 tn/yr of the pollutant VOC to remain below the threshold limit for a criteria pollutant and a throughput limit of 4,490 gal/yr of coating per paint booth during a 12 consecutive month period.
- (b) Regulation 7.59, section 3.1 specifies VOC content limits for all coatings used in the paint booths.

2) **Opacity**

Regulation 7.08, section 3.1.1 establishes an opacity standard of less than 20%.

3) **PM**

The emission standard for PM for each paint booth with a process throughput of less than 30 tons/hr is determined in accordance with Regulation 7.08, section 3.1.2 as follows:

$$\text{PM lb/hr limit} = 3.59 * (\text{process weight tons/hr})^{0.62}$$

4) **HAP**

Regulation 2.17, section 5.1 specifies emission limits for Single HAP emissions and Total HAP emissions.

5) **TAC**

Regulation 5.21 requires sources to demonstrate environmental acceptability for each Category 1 and Category 2 TAC per Regulation 5.20, 5.21, 5.22, and 5.23. The TAC emissions, calculated based on the coating usage limit, from this unit have been determined by the District to be de minimis.

iii. **Monitoring and Recordkeeping**

The owner or operator shall maintain all the required records for a minimum of 5 years and make the records readily available to the District upon request.

1) **VOC**

Regulation 7.59, section 6.1 and section 6.2 require the permit to include monitoring and recordkeeping requirements to ensure compliance with the terms and conditions of the permit. The owner or operator shall maintain records monthly of the required monitoring and recordkeeping.

2) **Opacity**

Regulation 2.17, section 5.2 requires the permit to include testing, monitoring, and recordkeeping requirements to ensure compliance with terms and conditions of the permit. The owner or operator shall maintain records monthly of the required monitoring and recordkeeping.

3) **PM**

Regulation 2.17, section 5.2 requires the permit to include testing, monitoring, and recordkeeping requirements to ensure compliance with terms and conditions of the permit.

4) **HAP**

Regulation 2.17, section 5.2 requires the permit to include monitoring and recordkeeping requirements to ensure compliance with terms and conditions of the permit.

5) **TAC**

(a) Regulation 5.21 does not require any specific monitoring and recordkeeping requirements for TACs, however to show compliance, monitoring and recordkeeping is required, by regulation 2.17, section 7.1.

(b) The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to Material Safety Data Sheets (MSDS), analysis of emissions, and calculations, per Regulation 5.21, section 4.10. These records shall be available to the District upon request.

iv. **Reporting**

Regulation 2.17, section 2, requires stationary sources for which a FEDOOP is issued shall submit an annual compliance certification by April 15. In addition, the source shall submit an annual compliance report to show compliance with the standards by March 1, of the following calendar year. Compliance reports and compliance certifications shall be signed by a responsible official and shall include a certification statement per Regulation 2.17, section 3.5.

1) **VOC**

Regulation 2.17, section 5.2 requires reporting to ensure compliance with the terms and conditions of the permit.

1) **Opacity**

Regulation 7.08 does not require any specific reporting requirements for opacity, however, Regulation 2.17, section 5.2 requires reporting to ensure compliance with the terms and conditions of the permit. The source is required to report any permit deviations or exceedances of the opacity standard in their annual compliance reports.

2) **PM**

Regulation 2.17, section 5.2 requires reporting to ensure compliance with the terms and conditions of the permit. The source is required to report information regarding PM By-Pass Activity.

2) **HAP**

Regulation 2.17, section 5.2 requires reporting requirements to ensure compliance with the terms and conditions of the permit.

3) **TAC**

(a) Regulation 5.21, sections 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration within 6 months of making a change that impacts the demonstration of environmental acceptability.

(b) Regulation 2.17, section 7.1 requires reporting requirements to ensure compliance with the terms and conditions of the permit.

c. **Emission Unit U2 – Welding Operations**i. **Equipment:**

P/PE	Capacity	Install Date	Applicable Regulation	Basis for Applicability
E3: Miller, model CP-302 (17H)	45,000 in/hr	1/2/2012	7.08, 40 CFR 63, XXXXXX	Federal Regulation 40 CFR part 63, subpart XXXXXX establishes the requirements for HAP emissions for a source primarily
E4: Miller, model CP-302 (17C)	45,000 in/hr	1/2/2012		
E5: Miller, model CP-302 (17G)	45,000 in/hr	1/2/2012		

P/PE	Capacity	Install Date	Applicable Regulation	Basis for Applicability
E6: Miller, model CP-302 (17E)	45,000 in/hr	1/2/2012		<p>engaged in one of nine process categories.</p> <p>Regulation 7.08 establishes the requirements for PM emission from new processes that commence construction after September 1, 1976.</p>
E7: Miller, model CP-302 (17I)	45,000 in/hr	1/2/2012		
E8: Miller, model CP-302 (17B)	45,000 in/hr	1/2/2012		
E9: Miller, model CP-302 (#4)	45,000 in/hr	1/2/2012		
E10: Miller, model CP-302 (17J)	45,000 in/hr	1/2/2012		
E11: Miller, model CP-302 (17A)	45,000 in/hr	1/2/2012		
E12: Miller, model CP-302 (17F)	45,000 in/hr	1/2/2012		
E13: Miller, model CP-302 (#19)	45,000 in/hr	1/2/2012		
E14: Miller, model CP-302 (17K)	45,000 in/hr	1/2/2012		
E15: Miller, model CP-302 (17L)	45,000 in/hr	1/2/2012		
E16: Miller, model CP-302 (17M)	45,000 in/hr	1/2/2012		
E17: Miller, model 452 (17O)	45,000 in/hr	1/2/2012		
E18: Miller, model 350P (17N)	42,000 in/hr	1/2/2012		
E19: Miller, model 452 (17P)	45,000 in/hr	1/2/2012		
E20: Miller, model 250-DX TIG (17D)	45,000 in/hr	1/2/2012		
E21: Miller, model 251 (17Q)	45,000 in/hr	1/2/2012		

ii. **Standards/Operating Limits**

1) **HAP**

Regulation 40 CFR 63, subpart XXXXXX establishes management practices to be implemented by the source.

2) **Opacity**

Regulation 7.08, section 3.1.1 establishes an opacity standard of less than 20%.



3) **PM**

The emission standard for PM for each welding operation with a process throughput of less than 30 tons/hr is determined in accordance with Regulation 7.08, section 3.1.2 as follows:

$$\text{PM lb/hr limit} = 3.59 * (\text{process weight tons/hr})^{0.62}$$

4) **TAC**

Regulation 5.21 requires sources to demonstrate environmental acceptability for each Category 1 and Category 2 TAC per Regulation 5.20, 5.21, 5.22, and 5.23. The TAC emissions from this unit have been determined by the District to be de minimis.

iii. **Monitoring and Recordkeeping**

The owner or operator shall maintain all the required records for a minimum of 5 years and make the records readily available to the District upon request.

1) **HAP**

Regulation 2.17, section 5.2 requires the permit to include testing, monitoring, and recordkeeping requirements to ensure compliance with the terms and conditions of the permit. Federal Regulation 40 CFR part 63, subpart XXXXXX establishes the requirements that must be met to ensure compliance.

2) **Opacity**

Federal Regulation 40 CFR part 63, subpart XXXXXX includes the requirements to meet the opacity standards.

3) **PM**

Regulation 2.17, section 5.2 requires the permit to include testing, monitoring, and recordkeeping requirements to ensure compliance with terms and conditions of the permit. The source cannot exceed the standard set by Regulation 7.08.

4) **TAC**

- (a) Regulation 5.21 does not require any specific monitoring and recordkeeping requirements for TACs, however to show compliance, monitoring and recordkeeping is required, by regulation 2.17, section 7.1.
- (b) The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to Material Safety Data Sheets (MSDS), analysis of emissions, and calculations, per Regulation 5.21, section 4.10. These records shall be available to the District upon request.

iv. **Reporting**

Regulation 2.17, section 2, requires stationary sources for which a FEDOOP is issued shall submit an annual compliance certification by April 15. In addition, the source shall submit an annual compliance report to show compliance with the standards by March 1, of the following calendar year. Compliance reports and compliance certifications shall be signed by a responsible official and shall include a certification statement per Regulation 2.17, section 3.5.

1) **HAP**

Regulation 2.17, section 5.2 requires reporting requirements to ensure compliance with the terms and conditions of the permit. Federal Regulation 40 CFR part 63, subpart XXXXXX establishes the reporting requirements.

2) **Opacity**

Federal Regulation 40 CFR part 63, subpart XXXXXX includes the reporting requirements for opacity.

3) **PM**

The source is not required to submit reporting documentation for PM.

3) **TAC**

- (a) Regulation 5.21, sections 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration within 6 months of making a change that impacts the demonstration of environmental acceptability.
- (b) Regulation 2.17, section 7.1 requires reporting requirements to ensure compliance with the terms and conditions of the permit.

**III. Other Requirements**

- 1. **Temporary Sources:** The source did not request to operate any temporary facilities.
- 2. **Short Term Activities:** The source did not report any short term activities.
- 3. **Emissions Trading:** N/A
- 4. **Operational Flexibility:** The source did not request any operation flexibility.
- 5. **Compliance History:** There are no records of any violations of the terms of the present or prior construction or operating permits.
- 6. **Calculation Methodology or Other Approved Method:**
  - Paint Booths (U1): Material Safety Data Sheets (MSDS) and usage information provided by the company were used to determine Potential To Emit. TAC emissions shall be determined based the MSDS of the coating materials used in the paint booths.
  - Welding Machines (U2): MSDS and usage information provided by the company were used to determine the Potential to Emit. TAC emissions shall be determined based the MSDS of the welding wire/rod used in the welding process.
- 7. **Insignificant Activities:** The source does not currently operate any insignificant activities.
- 8. **Basis of Regulation Applicability for IA units:** The source does not currently operate any insignificant activities.